



**California State Association of Counties**  
**1100 K Street, Suite 101**  
**Sacramento, CA 95814**



**Regional Council of Rural Counties**  
**1215 K Street, Suite 1650**  
**Sacramento, CA 95814**

January 19, 2010

Ms. Anna Marie Young  
Assistant Planner, State Clearinghouse  
Governor's Office of Planning & Research  
1400 Tenth Street  
Sacramento, CA 95814

**Re: Strategic Growth Council's Draft Consensus on Federal Transportation Policy**

Dear Ms. Young:

On behalf of California's 58 counties, we appreciate the opportunity to comment on the Strategic Growth Council's (SGC) Consensus on Federal Transportation Policy draft. As you are aware, the California State Association of Counties (CSAC), the Regional Council of Rural Counties (RCRC), and the County Engineers Association of California (CEAC) have been participating in the California Department of Transportation's (Caltrans) California Alliance for Leadership in Mobility working group since 2007. This group of stakeholders, including Administration agencies who are members of the SGC, local governments, public agencies and the private sector worked for many months to develop the Consensus Principles for Federal Transportation Authorization, which was published in 2008. This document is representative of a very long process of discussion regarding every area of transportation policy and consensus of a group of stakeholders with varying ideas about the future of the federal transportation system.

SGC asked for general comments on the "packaging" of the two documents and specific comments regarding the SGC policy. Please accept the following comments:

**Packaging the SGC Document**

We are concerned that the SGC has embarked on the further development of one of the principles in the Caltrans Consensus platform, #6 "Strengthen Comprehensive Environmental Stewardship," without regard to all other vital aspects of federal policy. Specifically, the issue as to how to "package" the SGC document with the Caltrans document. They certainly are not equal in stature and should not be presented to our federal partners as such. As you may be aware, after completion of the Caltrans Consensus platform, Caltrans embarked on a project of further developing every priority policy area with smaller working groups. Both CSAC and RCRC participated in a number of these groups. However, no final policy papers were completed, which would have provided additional, specific guidance to our federal partners regarding the State's views on reauthorization. It is understandable that the SGC may participate in a similar process, with Caltrans as the Administration lead, and develop more specific policy recommendations regarding area #6. At the same time other working groups would be developing similar

recommendations in the areas of transportation finance, safety, freight mobility and transit, which would provide a balanced approach to our lobbying platform.

As a multi-year participant and signatory of the Caltrans Consensus principles, we would not recommend that the SGC policy be finalized and presented as equal documents to our federal partners. We would recommend that Caltrans resume their policy paper development and then work within the Consensus Group to incorporate the work on SGC into the broader framework.

Finally, as active participants in the Regional Targets Advisory Committee process, the SGC's development of planning grant guidelines, and the California Transportation Commission's Regional Transportation Plan Guidelines amendments, all focused on the implementation of AB 32 and SB 375, the draft SGC Consensus document should be vetted among these State agencies and stakeholders for consistency with other state directives.

### **SGC Policy Goals**

CSAC and RCRC's highest priority for the reauthorization of the federal highway program is the preservation and maintenance of the existing system. Our members believe that existing infrastructure must be returned to a good state of repair to increase the mobility and the safety of the network. Urban highways, rural roads and transit systems are aging at a rate that is far outpacing the combined federal, state and local financial commitments to transportation. The preservation and safety of the system is reflected in the California Consensus document in many areas. We believe that maintenance, versus new construction, would also be a compliment to the SGC principles. We look forward to working with you to further incorporate these objectives into any SGC recommendations.

Additionally, the majority of SGC policy goals are allowable under current federal and state law. In fact, as mentioned in the document, California has already embarked on an innovative path for the future of planning and integrated land use decision making. However, many states do not come close to the planning and funding systems we find common place in California. For example, other states do not combine a Regional Housing Needs Assessment (RHNA) framework with their Metropolitan Planning Organizations (MPO) process. Additionally, most other states do not have Regional Transportation Planning Agencies (RTPA) with funding and decision making authority outside of MPO areas. It is difficult for the State of California, who thrives on flexibility and innovation, to assume that a one size fits all federal policy will be effective here or in any other state in the nation. Moreover, it is even unclear to our organizations how the new scenario-based planning called for in the SGC draft would interface with the development of Sustainable Communities Strategies now required by state law in Regional Transportation Plans. Regional and local governments are already overwhelmed with SB 375 implementation let alone any new federal mandates. While it is positive to see the SGC document advocating the federal government to "incentivize and encourage" current California practices throughout the country, but it is clear that the SGC is further advocating for federal planning and project funds to be funneled to those who follow our path.

Specifically, one of the concerning policy points throughout the SGC document is the request to "fully integrate public health benefits into transportation planning and performance measures at the regional, state and national levels," as stated in the first bullet of the "Recommended Framework." How does the SGC see this in practice? It is clear from discussions with the SGC working group that there currently exist no actual benchmarks by which to measure this new "public health" factor. How would planners actualize this into a long range plan, when there is no measurement? It would seem more plausible to encourage the federal government to conduct a study of public health guidelines as they relate to transportation planning in anticipation of looking at this factor in the future. Again, the State of California has the flexibility to do this now at the local level, if they so choose.

Finally, California's 18 MPOs do not represent all counties in the state. Those counties outside of an MPO area develop their transportation plans through their RTPA. We would encourage the SGC to not support policies at the federal or state level that may cut these areas out of funding opportunities based solely upon their size and population. The rural areas of California are committed to developing transportation plans that bring jobs to their communities, revitalize their downtowns and enhance the rural way of life. The rural transportation network in California is vast and critical to the efficient and effective movement of people and goods throughout the state. The rural road network is in dire need of improved safety infrastructure and basic maintenance. That fact cannot be overlooked as a major component to any transportation plan.

Thank you for the opportunity to comment of the SGC Federal Transportation Consensus document. California's counties are committed to advocating for the funding and policies necessary to continue to allow California to be innovative and creative in finding solutions to our transportation problems. CSAC and RCRC look forward to working with SGC and the Caltrans Consensus Working Group to finalize and coordinate our policy platform for reauthorization. Attached for your consideration are specific recommend changes to the draft.

Please feel free to contact us at any time: Melissa White, RCRC (916/447-4806, [mwhite@rcrcnet.org](mailto:mwhite@rcrcnet.org)); DeAnn Baker, CSAC (916-650-8104, [dbaker@counties.org](mailto:dbaker@counties.org)).

Sincerely,



Melissa M. White  
RCRC Federal Affairs Coordinator



DeAnn Baker  
CSAC Senior Legislative Representative

Attachment